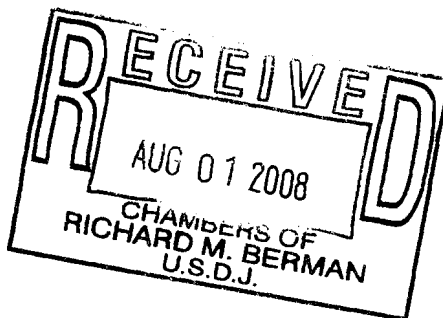


HOGAN &  
HARTSON



Hogan & Hartson LLP  
875 Third Avenue  
New York, NY 10022  
+1.212.918.3000 Tel  
+1.212.918.3100 Fax

www.hhlaw.com

July 31, 2008

Frank T. Spano  
Partner  
212.918.3522  
fspano@hhlaw.com

**BY HAND DELIVERY**

Hon. Richard M. Berman  
United States District Court  
Southern District of New York  
United States Courthouse  
Room 201  
40 Centre Street  
New York, NY 10007

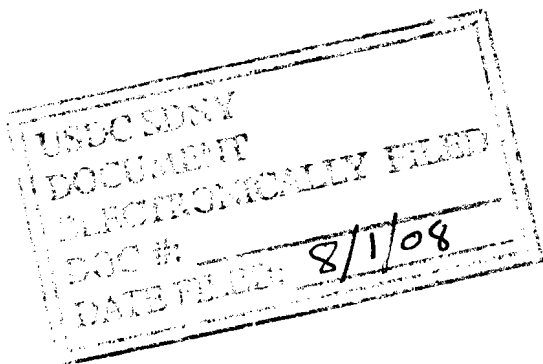
**MEMO ENDORSED**

**Re: MBIA Inc. v. Federal Ins. Co. et al., Case No. 08-CIV-4313 (S.D. N.Y.)**

Dear Judge Berman:

The parties in the above-captioned case write to request an extension of time to file a stipulation of facts.

The Court's July 8, 2008 Case Management Plan requires the parties to submit a stipulation of facts by July 31, 2008. The parties have been unable to agree upon a stipulation that will meaningfully reduce the scope of discovery. However, the parties believe that an additional week will give them an opportunity to submit a limited stipulation of facts. Therefore, the parties respectfully request a two-week extension until August 14, 2008, to submit a stipulation of facts to the Court.



<u>Application granted.</u>	
SO ORDERED: Date: <u>8/1/08</u>	<u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.

This is the first request for an extension of time for the filing of a stipulation of facts.

Sincerely yours,

HOGAN & HARTSON L.L.P.

By Frank T. Spano

Frank T. Spano (FS-1193)  
875 Third Avenue  
New York, NY 10022  
(212) 918-3000 (Phone)  
(212) 918-310 (Fax)

David Hensler (admitted *pro hac vice*)  
Lisa Bonanno (admitted *pro hac vice*)  
Christopher Zaetta (admitted *pro hac vice*)  
555 13<sup>th</sup> Street, N.W.  
Washington, D.C. 20004  
(202) 637-8874 (Phone)  
(202) 637-5910 (Fax)

Attorneys for Federal Insurance Company

HOWREY LLP

By James G. McCarney

James G. McCarney  
Amory W. Donnelly  
Citigroup Center  
153 East 53<sup>rd</sup> Street, 54<sup>th</sup> Floor  
New York, NY 10022  
(212) 896-6500 (Phone)

Robert Shulman (admitted *pro hac vice*)  
Robert P. Jacobs (admitted *pro hac vice*)  
Lara A. Degenhart (admitted *pro hac vice*)  
Christine S. Davis (admitted *pro hac vice*)  
1299 Pennsylvania Ave., N.W.  
Washington, D.C. 20003  
(202) 783-0800 (Phone)  
(202) 383-6610 (Fax)

Attorneys for MBIA Inc.

DRINKER BIDDLE & REATH LLP

By Alan J. Joaquin

Alan J. Joaquin  
1500 K. Street, N.W.  
Suite 1100  
Washington, D.C. 20005  
(202) 842-8800  
(202) 842-8465

Attorneys for ACE American Insurance Company  
Frank T. Spano (FS-1193)

cc: Counsel to all parties